

AB:SP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

MELMARIE MERCADO BRAVO,

Defendant.

COMPLAINT

(21 U.S.C. §§ 846)

No. 23-MJ-1104

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EASTERN DISTRICT OF NEW YORK, SS:

MEGHAN AYERS, being duly sworn, deposes and states that she is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

In and about and between July 2022 to December 11, 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MELMARIE MERCADO BRAVO did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1).

(Title 21, United States Code, Sections 846)

MERCADO BRAVO would leave her residence that same day and meet with another individual to deliver the shipment of cocaine.

5. On or about December 7, 2023, at a United States Postal Service (“USPS”) Mail Processing Facility in New York, New York, a Postal Inspector at the New York, New York Processing Facility intercepted a suspicious parcel, which had arrived in New York, New York, via priority mail service from Isabela, Puerto Rico (the “Parcel”). The shipper of the Parcel was listed as “Zuleyda Santiago” at an address in Isabela, Puerto Rico. According to USPS records, “Zuleyda Santiago” or any other similar name is not a registered recipient at this mailing address. The recipient of the Parcel was listed as “Veronica Santiago” at an address in Brooklyn, New York. An image of the shipping label and the Parcel appears below:



6. During this investigation, USPIS has recovered numerous shipments,

bearing the return and/or recipient address depicted in the image of the Parcel above, that were revealed to contain cocaine upon execution of search warrants for those shipments obtained in the United States District Court Eastern District of New York. Additionally, postage for both the above-pictured Parcel and these prior shipments were paid in cash.

7. The Postal Inspector brought the Parcel to the Brooklyn USPS Mail Processing Facility on December 7, 2023. The Parcel weighed approximately 7 pounds and 11 ounces and appeared very similar to prior packages destined to this address that were found to contain cocaine.

8. On or about December 11, 2023, law enforcement agents observed MERCADO BRAVO appear in the vestibule area of the SUBJECT PREMISES, appear to look around the street, and then retreat into the building.

9. Shortly thereafter, an undercover agent ("UC") acting as a USPS delivery worker conducted a controlled delivery of the Parcel at 2350 80th Street in Brooklyn, New York, a multi-family home. The UC delivered the package to the SUBJECT PREMISES vestibule.

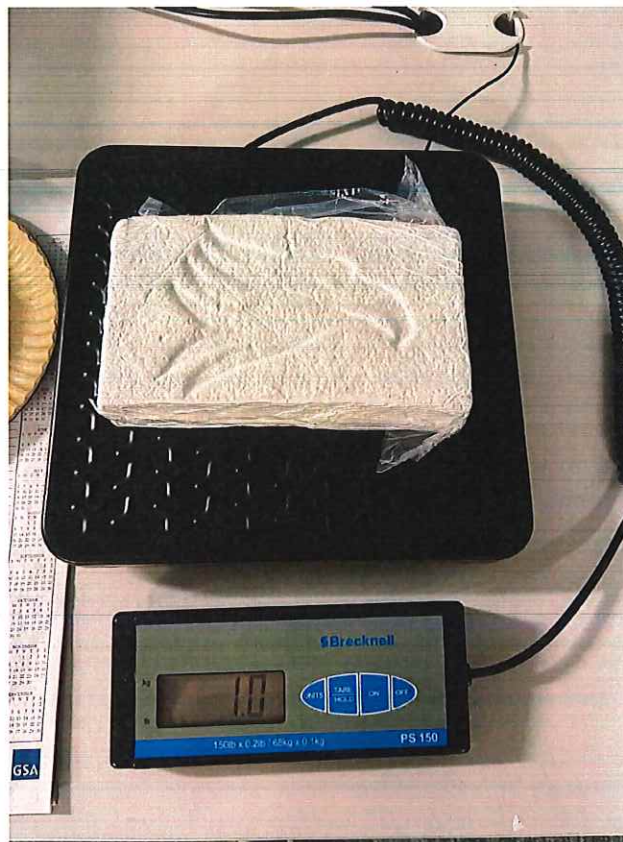
10. Several hours later, law enforcement agents observed MERCADO BRAVO wearing a bulky jacket, leave the SUBJECT PREMISES and enter a nearby subway station.

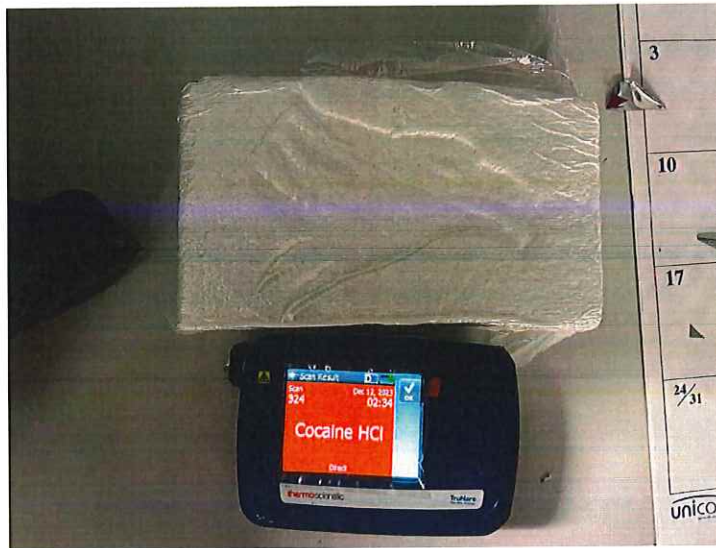
11. Law enforcement agents stopped MERCADO BRAVO inside the subway station and asked MERCADO BRAVO to identify herself. MERCADO BRAVO confirmed her identity to law enforcement agents.

12. Law enforcement agents informed MERCADO BRAVO that they were aware of her receipt of the Parcel and advised her of her Miranda rights. MERCADO BRAVO waived her Miranda rights and admitted to the agents that she knew the Parcel contained

narcotics, that the narcotics were at the SUBJECT PREMISES, i.e., her residence, and consented to a search of her residence.

13. Law enforcement agents then searched the SUBJECT PREMISES. Upon their search of the apartment rented by the defendant MERCADO BRAVO, agents recovered a white powdery substance packaged in a rectangular shape, the white USPS box depicted in the image of the Parcel in paragraph five, and the label affixed to the Parcel. The white powdery substance field tested positive for cocaine. Two images of the cocaine appear below:





14. The total approximate weight of the cocaine seized from the defendant MERCADO BRAVO's SUBJECT PREMISES was one kilogram.

WHEREFORE, your deponent respectfully requests that the defendant MELMARIE MERCADO BRAVO be dealt with according to law.

Meghan Ayers
Postal Inspector
United States Postal Inspection Service

Sworn to before me this
12th day of December, 2023

HONORABLE MARCIA M. HENRY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK